

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

PHILLIP MAROTTA,

Plaintiff,

v.

MI-JACK PRODUCTS, INC., FANTUZZI  
REGGIANE, FANTUZZI USA, INC. and  
MASSACHUSETTS PORT AUTHORITY,

Defendants.

C.A. No.: 05-10823RWZ

**DEFENDANT, MI-JACK PRODUCTS, INC.'S AUTOMATIC DISCLOSURE  
PURSUANT TO FED. R. CIV. P. 26A AND LOCAL RULE 26.2(A)**

**A. Individuals Likely To Have Discoverable Information:**

1. Phillip Marotta, Cape Neddick, Maine;
2. Employees of Columbia Coastal Transport, 1 Harborside Drive, Suite 200S, Boston, MA;
3. Pertinent representatives of Long Shoreman's Union Local ILA 1413, 173 Acushnet Avenue, New Bedford, MA;
4. Pertinent representatives of Fantuzzi Reggiane and Fantuzzi USA, Inc.;
5. Pertinent representatives of Mi-Jack Products, Inc., Hazel Crest, IL;
6. Pertinent Medical Care Providers;
7. Pertinent Worker's Compensation and employment personnel for the plaintiff;

The Defendant reserves the right to further supplement this list.

**B. Documents in the Defendant, Mi-Jack Products, Inc.'s Custody or Control That May Be Used to Support Claims or Defenses:**

1. Fantuzzi USA, Inc. International Distributor Agreement;
2. Operator and Maintenance Manual for Product;
3. Photographs produced by plaintiff's counsel;
4. Medical records produced by plaintiff's counsel;
5. Product identification and purchasing information;

The Defendant reserves the right to further supplement this response.

C. Computation of Damages

Not applicable.

D. Insurance Agreement

The Defendant is insured under a policy of insurance with Westchester Fire Insurance Company, Policy No. CG00010798, with a \$5 million occurrence limit and \$100,000 self-insured retention. A copy of the insurance policy and declaration pages have been produced.

The Defendant reserves the right to supplement these disclosures.

Respectfully submitted,  
The Defendant,  
ML-JACK PRODUCTS, INC.  
By its attorney,

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James P. Donohue, Jr., BBO # 555946  
SLOANE AND WALSH, LLP  
Three Center Plaza  
Boston, MA 02108  
617-523-6010

Date: July 12, 2005

CERTIFICATE OF SERVICE

I, James P. Donohue, Jr., counsel for the defendant, Mi-Jack Products, Inc., do hereby certify that on this 12<sup>th</sup> day of July, 2005, I caused the within document(s) to be served on all parties of interest by mailing a copy of same, postage prepaid, first class mail to the following:

John P. LeGrand, Esq.  
JOHN P. LEGRAND & ASSOCIATES, PC  
375 Broadway  
Suite 2  
Somerville, MA 02145

Mark B. Lavoie, Esq.  
McDonough, Hacking & Lavoie, LLP  
6 Beacon Street  
Suite 815  
Boston, MA 02108

  
JAMES P. DONOHUE, JR.